



CROSFIELDS SCHOOL

Policy/Procedure Name:	Data Protection Privacy Notice for Pupils aged 13 Years and Over
Date:	May 2025

Updates

This Privacy Notice may be updated periodically and without prior notice to you to reflect changes in our information practices or relevant laws. We will post a notice on our website to notify you of any substantive changes to the way we collect and use information. We have indicated at the top of the Privacy Notice when it was last updated.

1. What is the purpose of this document?

Under data protection law, individuals have a right to be informed about how the School uses any personal data that we hold about them. Once a pupil is 13 years old, they may be considered mature enough to understand these rights themselves rather than relying on their parents or guardians.

The law about data protection means that we (Crosfields) have to tell you what information we have about you. The law also says that when you are mature enough (and if you understand what is in this Guide, we will assume that you are mature enough) we will tell you directly about this information and not just tell your parents.

This Guide explains how we collect, store and use personal data about you while you are at Crosfields and in the future after you have left the School.

This privacy notice applies alongside any other information we may provide about a particular use of personal data, for example when collecting data via an online or paper form, and the information provided to pupils about our processing of personal data in relation to online lessons.

This privacy notice also applies in addition to the school's other relevant terms and conditions and policies, including:

- Terms and Conditions of the Parent Contract;
- The school's record retention procedures;
- The school's Safeguarding, pastoral, or Health and Safety policies, including as to how concerns or incidents are recorded;
- The school's IT policies, including the Staff Acceptable Use policy, Online Safety Policy, Data Protection Policy.

2. Who collects the information

We Crosfields School Trust Ltd and Crosfields School Enterprises Ltd, (our 'Group Companies') operating as Crosfields School ("the School"), are known as the 'data controller' for the purposes of data protection law.

You may remember from Thomas the Tank Engine that the Fat Controller was in charge. When it comes to your data Crosfields is known as the Data Controller which means we are in charge of your information and responsible for keeping it safe.

3. The kind of information we hold about you

We hold a lot of information about you. Before you joined the School we had information provided to us by your parents or Guardians and since you have been with us, we have gathered new information every year. It is important you know what data we hold, so here is a list of many of the different things we know about you:

- Personal details such as where you live, your email address or phone number, when your birthday is, which country you were born in, what languages you speak and who your parents, or Guardians are.
- Identification documents such as your birth certificate or passport.
- Information about your performance at school including marks throughout your time here and any exam results.
- Medical records and information, including details of anything we need to know to make sure we can keep you safe. For example, if you have asthma or if you are allergic to anything. We also have notes about any accidents that may have happened to you while you have been at the School.
- If we have had to help you with anything to keep you safe or to support you through any tough times, we keep records of that.
- We also need to know if we have had to give you any extra help in lessons
- Sensitive personal data such as your religious beliefs.
- Photographs and videos of you.
- CCTV images from around the School.
- Biometric data – see our *Biometric Information Notice*.

Sometimes other people, such as other schools you have been at, give us information that we also keep.

4. How we collect the information

A lot of this data was given to us when you joined the School. Since you have been at the School, we have also kept more information about you. If we ever ask for information from you we will always tell you if you have to tell us or if you can choose not to.

5. How we will use information about you

We use this data to help you while you are at Crosfields with things like:

- Lessons
- Your safety
- Communicating with you
- To make sure you are following our rules
- To help convince other kids to come to Crosfields
- To help us run the School for you

We will monitor your use of email; the internet and any internet based platform; and mobile electronic devices to ensure you are using them according to the rules set out in the School's *Safeguarding and Child Protection Policy*, *Online Safety Policy* and any other related policies.

Online Resources and Generative Artificial Intelligence ("Generative AI")

Before the school requires or recommends that pupils use an online resource as part of the curriculum, the resource will first be required to go through the school's Online Resources Approval process. This includes data protection checks to ensure that any personal data that is shared with the resource will be adequately protected. In relation to any resources involving Generative AI, it is school policy that staff and students are not permitted to input personal data into the resource. In addition, staff and students must, where it is an option, restrict the extent to which their data is used to train the underlying AI model. In cases where this is not possible via user settings, a full risk assessment must be performed.

Do we need your consent?

We all have to obey the law and, in the case of protecting your data, Crosfields has to tell you how we are doing that. The reason is 'Performance of a Contract'. Really what that means is that Crosfields is paid to provide you with an education and to make sure we keep you safe. That is the contract we have with your parents and why we have so much information about you.

Some of the data we have, like medical information and biometric information, is special. That means it is sensitive or could be more harmful to you if someone else found out about it. When we have information that is special we have to get consent from you.

In general, we will assume that your consent is not required to share information about you with your guardians, e.g. for the purposes of keeping guardians informed about your activities, progress and behaviour, and in the interests of your welfare.

However, if you raise a concern, confidentially, with a member of staff and expressly ask us not to tell your guardians, we may decide that it is in your best interests for us to share that information with them or it is required by law for us to share it with them or other people.

How we may share the information

Mostly, we will keep all your data ourselves although sometimes we will need to share it with other people or businesses. Some examples of when we need to share your data are:

- For you to use the online apps and software in your lessons
- If we think that you or a member of staff are at risk
- Sometimes we have to co-operate with other agencies to:
 - check how well we are doing as a school
 - put together statistics that will help us understand how to do better, although we would not usually need your name when putting together these statistics
 - raise extra money for the School
 - ensure you are kept safe and well
 - if your parents ask us to
 - so that you can take part in assessments and examinations;

- so that you can take part in trips, visits, music lessons or extra-curricular activities;
- when you are going to another school we may send them information about you
- ensure the access system in the Senior School Building works.
- Allow you to pay for purchases from The Hatch.
- We ask other companies to support us such as IT support or catering

We will also share personal data with the police or the Government when we are legally required to do so.

We may also share personal data with emergency services, for example the Fire Brigade or Ambulance Service and local authorities to help them to respond to any emergency situation that may affect you.

6. Where information may be held

Most of the data we have about you is either in an electronic file or on paper. We keep the electronic files in the School's database (we call it a Management Information System or MIS) or in the cloud, and paper files are stored in lockable filing cabinets. Sometimes the law means we have to keep some of your information even after you have left Crosfields.

We do keep your information secure. Our IT team look after it properly on the network and all the filing cabinets, rooms and buildings are properly locked. We also have to make sure that all your teachers and the other people who work for Crosfields are taught about Data Protection.

7. Your rights to correct and access your information and to ask for it to be erased

Under data protection law, you have certain rights regarding how your personal data is used and kept safe:

- You may object to your personal data being used if it is causing you distress
- If you don't want us to keep in touch with you after you have left the School, you can ask for some of the information to be deleted, although you must understand that the law also requires us to keep certain details, such as medical records, for other reasons
- You don't want decisions being made about you by a computer or machine, rather than by a person
- If you think the information we have is inaccurate, you may ask for it to be corrected, deleted or destroyed, or you can ask us to limit what we use in the future. You may ask for compensation for damages that have been directly caused by a breach of the data protection regulations

To exercise any of these rights or to access your personal information, please contact the Privacy Officer privacy@crosfields.com.

8. How to complain

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our

data processing, please raise this with us in the first instance. To make a complaint, please contact the Privacy Officer privacy@crofields.com.

If not, contact the Information Commissioner at ico.org.uk/make-a-complaint/ or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

9. Changes to this privacy notice

We may update this privacy notice at any time.

If you have any questions about this privacy notice, please contact the Privacy Officer privacy@crofields.com.